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**POLIS & ASSOCIATES**  
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Counsel for Chapter 7 Trustee Karl T. Anderson.

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, RIVERSIDE DIVISION**

<b>In re</b>	)	<b>Case No. 6:17-bk-19336-SY</b>
	)	
<b>Pandora Hospice Care, Inc.,</b>	)	<b>Chapter 7</b>
	)	
	)	<b>Adv.Proc. No. 6:18-ap-01193-SY</b>
<b>Debtor.</b>	)	
	)	
<b>Karl T. Anderson, Chapter 7 Trustee,</b>	)	<b>DECLARATION OF THOMAS J. POLIS RE:</b>
<b>exclusively in his capacity as Chapter 7</b>	)	<b>POLIS &amp; ASSOCIATES' FEES</b>
<b>Trustee,</b>	)	
	)	
	)	<b>Hearing:</b>
<b>Plaintiff,</b>	)	<b>Date: November 18, 2021</b>
	)	<b>Time: 10:30 a.m.</b>
<b>vs.</b>	)	<b>Ctrm: 302, Third Floor</b>
	)	<b>US Bankruptcy Court</b>
<b>Nicholas Silao,</b>	)	<b>3420 Twelfth Street</b>
<b>Defendant.</b>	)	<b>Riverside, CA 92501</b>
	)	

**TO THE HONORABLE SCOTT H. YUN, U.S. BANKRUPTCY JUDGE; DEFENDANT**  
**NICHOLAS SILAO AND HIS COUNSEL OF RECORD; AND OTHER PARTIES ENTITLED**  
**TO NOTICE:**

**DECLARATION OF THOMAS J. POLIS**

I, Thomas J. Polis, declare as follows:

1. I am an attorney licensed to practice law in all courts in the State of California, including but without limitation, the United States Bankruptcy Court for the Central District of California. I am a principal of Polis & Associates, a Professional Law Corporation ("Polis &

1 Associates”), whose principal place of business is located at 19800 MacArthur Boulevard, Suite  
2 1000, Irvine, California 92612. I make this *Declaration re: Court’s Request for Polis &*  
3 *Associates’ Fees to be paid by Defendant Nicholas Silao or Defendant’s Prior Counsel, Sanaz*  
4 *Bereliani, Esq.* If compelled to do so, I would be able to competently testify under the penalty  
5 of perjury of the laws of the United States to all the factual statements herein.

6 2. On or about October 2, 2018, Plaintiff, Karl T. Anderson, Chapter 7 Trustee  
7 commenced his Adversary Proceeding, *Karl T. Anderson v. Nicholas Silao*, Adv.Pro.No. 6:18-  
8 ap-01193-SY.

9 3. On or about September 25, 2019, Defendant’s new counsel, Baruch Cohen, Esq.  
10 filed Defendant’s *Motion to Allow Withdrawal of Deemed Admissions* (ECF No. 31). On  
11 November 26, 2019, the Court entered an *Order Denying Defendant’s Motion to Allow*  
12 *Withdrawal of Deemed Admissions* (ECF No. 33).

13 4. On January 22, 2021, Defendant through his counsel filed a new *Motion to Allow*  
14 *Withdrawal of Deemed Admissions* (ECF No. 44).

15 5. On September 9, 2021, at Court’s evidentiary hearing Judge Yun ordered either  
16 the Defendant, Nicholas Silao or Defendant’s prior counsel, Sanaz Bereliani pay Polis &  
17 Associates’ legal fees defending this matter.

18 6. The total fees for this matter are \$18,905. A true and correct copy of Polis &  
19 Associates’ detailed billing invoice for this matter is attached hereto as Exhibit “A”.

20 I declare under the penalty of perjury of the laws of the United States that all my factual  
21 statements herein are true and correct.

22 Executed on this 23<sup>rd</sup> day of September, 2021.

23 /s/ Thomas J. Polis  
24 Thomas J. Polis  
25  
26  
27  
28

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**POLIS & ASSOCIATES  
A PROFESSIONAL LAW CORPORATION  
19800 MacArthur Boulevard, Suite 1000  
Irvine, California 92612-2433**

A true and correct copy of the foregoing document described **DECLARATION OF THOMAS J. POLIS RE: POLIS & ASSOCIATES' FEES** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")** – Pursuant to controlling General Order(s) and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **September 23, 2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Office of the United States Trustee - ustpregion16.sa.ecf@usdoj.gov  
Karl T Anderson (TR) 2edansie@gmail.com, kanderson@ecf.axosfs.com  
Sanaz Sarah Bereliani berelianilaw@gmail.com, chris@berelianilaw.com; r48595@notify.bestcase.com  
Baruch C Cohen bcc@BaruchCohenEsq.com, paralegal@baruchcohenesq.com

☐ Service information continued on attached page

**2. SERVED BY U.S. MAIL:**

On **September 23, 2021**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

- United States Bankruptcy Court, Central District of California, Honorable Scott Yun, 3420 Twelfth Street, Suite 345, Riverside, CA 92501

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

9/23/2021

*Date*

Cristina L. Allen

*Type Name*

/s/ Cristina L. Allen

*Signature*

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

June 2012

**F 9013-3.1.PROOF.SERVICE**